

IN THE U.S. DISTRICT COURT FOR NEBRASKA

RYSTA LEONA SUSMAN, BOTH  
INDIVIDUALLY AND AS NATURAL  
MOTHER OF SHANE ALLEN LOVELAND,  
A PROTECTED PERSON, SHANE ALLEN  
LOVELAND, A PROTECTED PERSON BY  
AND THROUGH HIS TEMPORARY  
GUARDIAN AND CONSERVATOR, JOHN  
SAUDER, and JACOB SUMMERS,

Plaintiffs,

vs.

THE GOODYEAR TIRE & RUBBER  
COMPANY,

Defendant.

CASE NO. CI 8:18-CV-00127

**REQUEST FOR ORAL ARGUMENTS  
CONCERNING KEARNEY'S PETITION  
TO INTERVENE, DOC NO. 95**

COMES NOW, Kearney Towing and Repair Center, Inc. ("Kearney") NeCivR 7.1 and, hereby respectfully requests oral arguments concerning its Petition to Intervene, Doc. No. 95, for purposes of modifying the existing Protective Order in this case Doc. No. 66 so that documentation produced in this case can be produced for and utilized in a collateral case filed by Plaintiffs against Kearney in Nebraska state court. It is suspected that oral arguments and/or a hearing concerning this matter may assist the parties in reaching a resolution of this discovery dispute without further court intervention or a ruling on the Petition. It is believed that 30 minutes is necessary for the arguments/hearing, which could be completed telephonically to ease any burden on the Court or the parties in scheduling these arguments/hearing.

Respectfully submitted,

KEARNEY TOWING & REPAIR CENTER, INC., A  
NEBRASKA CORPORATION



By: \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I hereby certify that on August 8, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

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